

Exhibit O

From: [Stuart Isaacs KC Singapore](#)
To: [Frederick TEO](#); [B J Roe](#)
Cc: [Samuel TEO](#); [TJONG Teck Wee](#); [Donny TRINH](#); [KOH Chiu Hwee](#); [Lynnette Lee](#); [Jamilah Basor](#); [Xuanzhong Wang](#); [Thi Mai Anh Nguyen](#); [biroe@roecorp.com](#)
Subject: SIAC/ARB 162/24
Date: Thursday, July 10, 2025 6:24:29 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)

USE CAUTION: External Email

Dear Colleagues and Mr Roe,

I refer to Mr Teo's below email on the Claimant's behalf.

1. The Tribunal is proceeding on the basis that, as stated by Ms Tan, her witness statement is withdrawn and she will not be appearing as a witness for the Respondents at the evidentiary hearing. Therefore, her statement and the GT Investigation Report exhibited to it will not form part of the evidence in this case.

2. The Statement of Defence (Amendment No. 1) (the "**ASOD**") has been duly filed and forms part of the Respondents' case which the Tribunal will have to consider and determine at the evidentiary hearing. Therefore, the Tribunal is not prepared at this stage to disregard any part of it. It will be open to the Claimant and the Respondent at the hearing to make submissions as to whether the various allegations in the ASOD have been established on the evidence before the Tribunal.

3. Similarly, the Tribunal is not prepared at this stage to disregard paragraphs 5.4.5 and 5.4.6 of Mr Roe's witness statement. As the result of the Tribunal's previous rulings, the question whether that statement is to be admitted in evidence at all remains to be determined, depending on whether Mr Roe appears remotely as a witness or not.

4. The Tribunal does *not* accede to the Claimant's request in paragraph 6 of Mr Teo's email. The Tribunal's previous directions stand, in order that Mr Roe on the Respondents' behalf should not be unduly pressured and should be afforded a proper opportunity to respond to the Claimant's previous applications.

5. Subject to any response from Mr Roe on the Respondents' behalf as previously directed, the Tribunal is in principle minded giving the Claimant an extension of time beyond 11 July 2025 for the filing of an amended Statement of Reply and for the hearing to take place on 23-25 July 2025. The hearing timetable will need to be discussed at the PHCC on 16 July 2025.

Kind regards,
Stuart Isaacs



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Stuart Isaacs KC practises from Stuart Isaacs Chambers (Pte) Ltd (UEN 202013953D), a limited liability foreign law practice.

From: Frederick TEO <frederick.teo@wongpartnership.com>

Sent: 10 July 2025 11:43

To: Stuart Isaacs KC Singapore <stuart@stuartisaacs.com>

Cc: Samuel TEO <Samuel.Teo@wongpartnership.com>; TIONG Teck Wee <TeckWee.Tiong@wongpartnership.com>; Donny TRINH <BaDuong.Trinh@wongpartnership.com>; KOH Chiu Hwee <chiuhwee.koh@wongpartnership.com>; Lynnette Lee <lynnettelee@siac.org.sg>; Jamilah Basor <jamilahbasor@siac.org.sg>; Xuanzhong Wang <xuanzhongwang@siac.org.sg>; Thi Mai Anh Nguyen <maianhnt@siac.org.sg>; bjroe@roecorp.com; B J Roe <bj@roecorp.com>

Subject: RE: Withdrawal as Respondents' Witness for SIAC/ARB 162/24 - for the Respondents (The Roe Corporation, 267 Partners, LLC and Buhm Jung Roe)

Dear Mr Stuart Isaacs KC,

1. We refer to the e-mail from Lynn-Yin Tan ("Ms Tan") to the Tribunal dated 10 July 2025, referring to her witness statement dated 20 June 2025 enclosing the Grant Thornton investigation report ("GT Report"), and informing the Tribunal of her "*withdrawal as the Respondents' witness in these proceedings*".
2. We interpret Ms Tan's e-mail to mean that she is withdrawing her witness statement and the GT Report, and that she will not appear at the evidentiary hearing of this arbitration to give evidence and be cross-examined. Accordingly, we respectfully request that the Tribunal disregards Ms Tan's witness statement and the GT Report, and exclude the same from the evidence in this arbitration.
3. In any case, there are no exceptional circumstances which exist that would justify admitting Ms Tan's witness statement and the GT report into evidence, notwithstanding that Ms Tan will not be giving evidence and/or presenting herself for cross-examination at the evidentiary hearing of this arbitration. On the contrary, allowing Ms Tan's witness statement and the GT report into evidence without giving the Claimant a chance to cross-examine Ms Tan on the same will seriously prejudice the Claimant's right to a fair hearing. This is especially given the Respondents' heavy reliance on the GT Report in support of their assertion that Global Wise was not ready, willing, and able to provide funding for Project Tribeca, which is one of the pillars of the Respondents' defence to the Claimant's claims in this arbitration. In fact, the GT Report is the primary (if not only) evidence that the Respondents have tendered in support of their assertion.
4. Consequently, we also respectfully request that the Tribunal:
 - a. Disregard all the amendments in the Respondents' Statement of Defence (Amendment No. 1) dated 20 June 2025 ("Amended Defence") save for the amendments at paragraph 4.4.6 and paragraph 4.5.3A. In this connection, it is apparent from the Respondents' Amended Defence that all their amendments save for the amendments at paragraph 4.4.6 and paragraph 4.5.3A are based solely on the GT Report. These amendments are all footnoted to the GT Report.
 - b. Disregard paragraphs 5.4.5 and 5.4.6 of the Witness Statement of Buhm Jung Roe dated 20 June 2025 ("Mr Roe's WS"), which are likewise also based on the GT Report.
5. This latest development reinforces the requests in our e-mail dated 9 July 2025 for (i) an extension of time until 15 July 2025 for the Claimant to file and serve its Amended Statement of Reply and factual witness statement, and (ii) for the time set aside for the evidentiary hearing to be reduced to 3 days, from 23 July 2025 to 25 July 2025.
 - a. The Claimant will require time to undo the work that it has already done to address the GT Report and the portions of the Amended Defence and Mr Roe's WS which refer to and/or rely on the GT Report, in its Amended Statement of Reply and factual witness statement.
 - b. There are now only two witnesses between the parties, and 3 days is more than sufficient to complete the evidentiary hearing. This is taking into account the Tribunal's indication in its e-mail dated 9 July 2025 (time-stamped 6.45pm Singapore time) that it wishes to receive oral closing submissions in lieu of writing closing submissions.
6. Given that the Claimant is due to submit its Amended Statement of Reply and factual witness statement by this Friday 11 July 2025, and the matters raised above and in our e-mail dated 9 July 2025 will have an

impact on the Claimant's submission, the Claimant respectfully requests that the Tribunal directs the Respondents to respond to both this e-mail and our e-mail dated 9 July 2025 by **10am Singapore time, 11 July 2025** (which is 10pm New York time, 10 July 2025), so that the Tribunal will have sufficient time to render its decision on the various matters and the Claimant will have sufficient time to react. This is not unreasonable as the Respondents will have the whole of the working day in New York on 10 July 2025 to consider and prepare their response.

7. All the Claimant's rights in the matter are fully and expressly reserved, including to claim wasted costs against the Respondents arising from among other things, Ms Tan's withdrawal.
8. We thank the Tribunal for its kind attention to this matter.

Regards,
WongPartnership LLP

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Associate

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From: Stuart Isaacs KC Singapore <stuart@stuartisaacskc.com>
Sent: Thursday, 10 July 2025 2:23 pm
To: B J Roe <bj@roecorp.com>
Cc: Samuel TEO <Samuel.Teo@wongpartnership.com>; TIONG Teck Wee <TeckWee.Tiong@wongpartnership.com>; Frederick TEO <frederick.teo@wongpartnership.com>; Donny TRINH <BaDuong.Trinh@wongpartnership.com>; KOH Chiu Hwee <chiuhwee.koh@wongpartnership.com>; Lynnette Lee <lynnettelee@siac.org.sg>; Jamilah Basor <jamilahbasor@siac.org.sg>; Xuanzhong Wang <xuanzhongwang@siac.org.sg>; Lynn-Yin Tan <lynn.tan@sg.gt.com>
Subject: Re: Withdrawal as Respondents' Witness for SIAC/ARB 162/24 - for the Respondents (The Roe Corporation, 267 Partners, LLC and Buhm Jung Roe)

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My email below now sent to Mr Roe also.
Kind regards,

Stuart Isaacs

Stuart Isaacs KC

On 10 Jul 2025, at 07:08, Stuart Isaacs KC Singapore <stuart@stuartisaacskc.com> wrote:

Dear Ms Tan,

I acknowledge receipt of your email. The Claimant's counsel and the SIAC are included in copy.

Kind regards,

Stuart Isaacs

Stuart Isaacs KC

On 10 Jul 2025, at 04:54, Lynn-Yin Tan <lynn.tan@sg.gt.com> wrote:

Commercial in Confidence

Dear Stuart,

I refer to my witness statement dated 20 June 2025 which I am informed has been filed in these arbitration proceedings SIAC/ARB 162/24 (the "Arbitration") by the Respondents, The Roe Corporation, 267 Partners, LLC and Buhm Jung Roe.

I am writing to formally notify Tribunal in the Arbitration of my withdrawal as the Respondents' witness in these proceedings.

The withdrawal is due to the termination of my Firm's engagement with the Respondents in the Arbitration, The Roe Corporation, 267 Partners, LLC and Buhm Jung Roe, effective as of July 10, 2025.

Thank you for your attention to this matter.

Regards,

Lynn

Lynn-Yin Tan
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